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1 MCIWORLDCOM, INC
2 DIRECT TESTIMONY OF GREG DARNELL
3 BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
4 DOCKET NO. 2000 - 0122 - C
5 APRIL 3, 2000

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UTILITY DEPARTMENT

7 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

8 A. My name is Greg Darnell, and my business address is 6 Concourse
9 Parkway, Suite 3200, Atlanta, Georgia, 30328.

10

11 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

12 A. I am employed by MCI WorldCom, Inc as Regional Senior Manager --
13 Public Policy.

14

15 Q. HAVE YOU PREVIOUSLY TESTIFIED?

16 A. Yes, I have testified in proceedings before regulatory commissions in
17 Alabama, California, Florida, Georgia, Kentucky, Louisiana, Mississippi,
18 North Carolina, South Carolina and Tennessee and on numerous
19 occasions have filed comments before the FCC. Provided as
20 Attachment 3 to this testimony is a summary of my academic and
21 professional qualifications.

22

23 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

RETURN DATE: OK DBW
SERVICE: OK DBW

1 A. The purpose of this testimony is to provide MCI WorldCom's position
2 on how the South Carolina Public Service Commission ("Commission")
3 should "deaverage" the Unbundled Network Element (UNE) rates it
4 determined in Docket 97-374-C.¹

5
6 Q. WHY MUST THE SOUTH CAROLINA COMMISSION ESTABLISH
7 DEAVERAGED UNE RATES?

8 A. First, since UNEs are inputs that many competitors will use to
9 determine whether and where to enter the local telecommunications
10 market, it is essential that the rates for these inputs are cost based so
11 that the correct build, buy or not enter signals can be sent to potential
12 market entrants. Second, the Federal Communications Commission
13 (FCC) has announced that its stay of 47 Code of Federal Regulations
14 (C.F.R.) Section 51.507(f) (the "Deaveraging Rule") will be lifted on
15 May 2, 2000.²

16
17 Q. WHAT RULES ARE THERE CONCERNING HOW UNE RATES SHOULD
18 BE DEAVERAGED?

¹ In re: Proceeding to Review BellSouth Telecommunications, Inc.'s, Cost Studies for Unbundled Network Elements, Before the Public Service Commission of South Carolina, Docket No.97-374-C, Order No. 98-214, Order Ruling on Costs, June 1, 1998.

² Federal State Joint Board on Universal Service, Ninth Report and Order and Eighteenth Order on Reconsideration, CC Docket No. 96-45, (rel. Nov. 2, 1999)(Methodology Order).

1 A. All UNE rates, averaged and deaveraged, must adhere to the General
2 Pricing Standards covered in 47 C.F.R. Section 51.503 and the
3 Forward-Looking Economic Cost Standards covered in 47 C.F.R.
4 Section 51.505. Further, in accordance with 47 C.F.R. Section
5 51.507(f), UNE rates must be deaveraged "in at least three defined
6 geographic areas within the state to reflect geographic cost
7 differences."

8
9 Q. AS A RESULT OF THESE RULES, WHAT CAN BE USED TO
10 DETERMINE DEAVERAGED UNE RATES?

11 A. The only item that can be considered in determining deaveraged UNE
12 rates is the forward looking economic cost (FLEC) differences caused
13 by different geographic areas. This is because, assuming the average
14 UNE rate is cost based, if something other than FLEC is used to
15 deaverage the existing rate, the resulting deaveraged rates will no
16 longer be cost based and this would violate 51.503 and 51.505 of the
17 FCC rules.

18 For example, if we used the percentage of BMW automobiles by
19 city to deaverage existing UNE rate, the resulting deaveraged UNE
20 rates in Spartanburg would be higher than the rates in Florence
21 because of the BMW plant in Spartanburg. Given that the percentage
22 of BMW automobiles has no influence over the FLEC of
23 telecommunications, the resulting deaveraged rates would not be cost

1 based.

2 I used the noticeable strange example of BMWs to illustrate a
3 point. However, the same result would hold true (i.e. non-cost based
4 deaveraged UNE rates), if something telecommunication related but
5 not telecommunication cost related is used to deaverage existing UNE
6 rates. For example, if BellSouth's retail rates - which are admittedly
7 even by BellSouth not based on FLEC- were used to deaverage
8 existing UNE rates, the resulting deaveraged UNE rates would likewise
9 not be cost based.

10

11 Q. HOW DOES BELL SOUTH PROPOSE TO DE AVERAGE EXISTING UNE
12 RATES?

13 A. By lumping together wire centers by rate group and then determining
14 the average cost of wire centers that have the same retail rates.

15

16 Q. WHY DOES MCI WORLD COM OPPOSE BELL SOUTH'S PROPOSAL TO
17 DE AVERAGE UNE RATES BY RATE GROUP?

18 A. MCI WorldCom believes that deaveraged UNE rates must reflect the
19 relative forward looking economic cost differences of the UNEs
20 between geographic areas. BellSouth's proposal to deaverage UNE
21 rates through the use of the average cost of wire centers that have
22 the same retail cost is a violation of FCC rules. BellSouth's proposal
23 to create non-cost based deaveraged UNE rates will send incorrect

1 economic signals to the marketplace. Further, BellSouth's proposal to
2 create the geographic zones by rate group is thinly veiled attempt to
3 insulate its retail rates from cost based competition.

4
5 Q. HOW DOES BELLSOUTH'S PROPOSAL TO USE ITS RATE GROUPS
6 TO DEAVERAGED UNE RATES INSULATE ITS RETAIL RATES FOR
7 COST BASED COMPETITION?

8 A. By first grouping wire centers together by rate group, BellSouth's
9 deaveraging methodology inappropriately raises the UNE rates where
10 its retail rates are high. BellSouth takes all the wire centers that serve
11 areas in their rate groups 7&6 (i.e. their highest retail rates in the
12 state) and lumps all of them together in one basket. As can be seen
13 by looking at attachment DDC-2 to Ms. Daonne Caldwell's direct
14 testimony, CLLI code CLMASCSN, which is the Columbia Senate
15 Street wire center, is placed in Zone 1 by BellSouth's methodology.
16 This wire center has an average monthly loop cost of \$14.68.
17 BellSouth's methodology also places CLLI code EOVRSCMA, which is
18 the Eastover Main wire center, in Zone 1. This CLLI code is a wire
19 center with an average monthly loop cost of \$46.82. Therefore,
20 BellSouth's methodology places both low cost and high cost wire
21 centers in Zone 1. By using rate groups to lump together low and
22 high cost wire centers in the same zone, BellSouth raises the average
23 cost of that zone and that raises the deaveraged UNE rates for that

1 zone. The resulting higher than cost based deaveraged UNE rates
2 insulate BellSouth's high retail rates in low cost areas from some cost
3 based UNE based local competition.

4
5 Q. DOES BELLSOUTH'S PROPOSAL COMPLY WITH 47 C.F.R. 51.503?

6 A. No. 47 C.F.R. 51-503 requires that BellSouth Unbundled Network
7 Element prices be based on forward looking economic cost. This rule
8 applies to averaged and deaveraged rates of both individual UNEs and
9 combination of UNEs. BellSouth's retail rate groups are not currently
10 based on forward looking economic cost. Therefore, BellSouth's
11 proposal to deaverage UNE rates using its current rate groups as the
12 basis for categorization would violate 51.503 because it does not
13 result in forward looking economic cost based, deaveraged UNE rates.

14
15 Q. DOES BELLSOUTH'S PROPOSAL COMPLY WITH 47
16 C.F.R.51.505(d)?

17 A. No. 47 C.F.R. 51.505(d) states that the revenues of other services
18 cannot be considered in the development of a UNE rate. BellSouth's
19 proposal violates 51.505(d) by considering the revenues of the
20 services of its rate groups in the development of its deaveraged UNE
21 rates.

22
23 Q. WHAT ARE MCI WORLDCOM'S RECOMMENDATIONS?

1 A. Due to the practical fact that most, if not all, UNE billing and call rating
 2 is done by wire center, MCI WorldCom recommends that the cost
 3 differences of at least three geographic areas be determined by
 4 evaluating the BellSouth's loop cost by wire center. These cost
 5 differences should be applied to the current averaged UNE rates to
 6 determine interim deaveraged rates.³ Wire centers with similar cost
 7 characteristics should be grouped together to create a minimum of three
 8 zones.

9
 10 Q. HOW CAN THIS BE ACCOMPLISHED FOR BELL SOUTH'S UNE RATES
 11 IN SOUTH CAROLINA BY MAY 2, 2000?

12 A. BellSouth's stand alone UNE loop rates adopted in Docket No. 97-374-
 13 C- were developed from BellSouth's TELRIC calculator cost model. The
 14 TELRIC calculator determines BellSouth's "average" loop cost by
 15 utilizing a statistical sample. The TELRIC calculator does not provide the
 16 information necessary to determine costs that reflect geographic cost
 17 differences.⁴ The HAI cost model proposed in Docket 97-374-C by

³ MCIWorldCom does not concede that the current average UNE rates in South Carolina are cost based and any deaveraged rates that are determined from the current average UNE rates are cost based under the FCC rules.

⁴ As stated by D. Daonne Caldwell, Direct Testimony on Behalf of BellSouth before the Florida Public Service Commission, Docket No. 990649-TP, August 11, 1999, p. 10, "However, the sample approach did have inherent limitations. First, the sample was statistically valid only for the services tested, i.e., only for single line residential and business loops and only on a statewide average basis. Any attempt to stratify the sample into geographic areas for geographic deaveraging could not be

1 AT&T does provide the information necessary to determine costs that
2 reflect geographic differences. However, HAI was not adopted by the
3 South Carolina Commission for stand alone loops. In order to offer up a
4 neutral cost model that can be used to deaverage UNE rates in South
5 Carolina, MCIWorldCom recommends that the FCC's Synthesis Cost
6 Model (SCM) adopted in the Methodology Order be used to determine
7 the geographic cost differences by wire center.
8

9 Q. USING THE FCC'S SCM, HOW DOES MCIWORLD.COM PROPOSE
10 THAT UNE RATES BE DEAVERAGED IN SOUTH CAROLINA IN ORDER
11 TO MEET THE MAY 2, 2000 DEADLINE?

12 A. MCIWorldCom proposes that a straightforward deaveraging of
13 BellSouth's average UNE rates be done in South Carolina. This can be
14 accomplished simply by ranking BellSouth's wire centers in order of
15 lowest cost to highest cost and placing the lowest cost wire centers in
16 zone 1, the next lowest cost wire centers in zone 2 and the highest
17 cost wire centers in zone 3, so that approximately 1/3 of BellSouth's
18 switched access lines fall into each zone. This is the deaveraging
19 solution that MCIWorldcom proposed in Florida. MCIWorldCom's
20 proposal can be seen at attachment 1 to this testimony.
21

statistically supported."

1 Q. WAS MCIWORLD.COM DE-AVERAGING PROPOSAL ULTIMATELY
2 AGREED TO BY PARTIES IN FLORIDA?

3 A. No. During negotiations to attempt to reach a de-a-veraging stipulation,
4 the Florida Staff offered up a counter proposal to both MCIWorldCom's
5 1/3 of the lines proposal and BellSouth's rate group de-a-veraging
6 proposal. Florida Staff's proposal was to rank BellSouth's wire center
7 from lowest cost to highest cost and place all wire centers that have an
8 average loop cost of between 0 and 100% of the BellSouth's statewide
9 average loop cost in Zone 1, place all wire centers that have an average
10 loop cost of between 100 and 200% in Zone 2 and place all wire
11 centers that have an average loop cost of over 200% in Zone 3. 17
12 parties, including, MCI WorldCom, AT&T and BellSouth agreed to this
13 categorization as an interim method to de-a-verage existing UNE rates in
14 Florida and entered into a stipulated agreement. This de-a-veraging
15 stipulation was adopted by the Florida Public Service Commission.
16 MCIWorldCom would be willing to accept this categorization in South
17 Carolina as an interim de-a-veraging solution in order to meet that May 2,
18 2000 deadline. Attachment 2 contains an analysis applying the Florida
19 Stipulation methodology to FCC SCM data and average UNE rates in
20 South Carolina. However, MCI WorldCom reserves its right to oppose
21 these interim de-a-veraged UNE rates and pursue permanent cost based
22 de-a-veraged rates in the future proceedings.
23

1 Q. CAN AN ANALYSIS SIMILAR TO THE ONE YOU HAVE DONE WITH
2 THE FCC'S SCM BE DONE USING OUTPUT FROM BELL SOUTH'S
3 BENCHMARK COST PROXY MODEL (BCPM) THAT WAS SUBMITTED
4 IN THE SOUTH CAROLINA UNIVERSAL SERVICE PROCEEDING?

5 A. Yes.

6

7 Q. FOR THE PURPOSES OF DEAVERAGING EXISTING UNE RATES, DOES
8 IT MAKE MUCH DIFFERENCE WHICH COST MODEL IS USED TO
9 CALCULATE THE RELATIVE COST DIFFERENCES BETWEEN ZONES?

10 A. No. The cost model used to determine the relative cost differences
11 between zones is not that important. This is because only the
12 "relative" cost differences are important in this analysis and cost
13 models tend to overstate or understate costs by the same basis
14 regardless of the area. Therefore, in this instance, what is important is
15 the method not the model.

16

17 Q. HOW DO YOU RESPOND TO BELL SOUTH'S PROPOSED UNE
18 COMBINATION RATES?

1 A. We agree that as a result of the decision of the United States Supreme
2 Court in *AT&T v. Iowa Utilities Board* and the reinstatement of several of
3 the Federal Communication Commission's ("FCC") rules, BellSouth is
4 required to provide UNE combinations, including loop-switching
5 combinations (sometimes referred to as the UNE-Platform or UNE-P) and
6 loop-transport combinations (sometimes referred to as Enhanced Extended
7 Links or "EELS") at rates which comply with the FCC's Total Element Long
8 Run Incremental Cost ("TELRIC") pricing standard. However, this is not
9 the appropriate proceeding to address the rates for UNE combinations.
10 The objective of this proceeding is to deaverage the average rates for
11 existing UNEs adopted by the Commission in its Order of June 1, 1998 in
12 Docket No. 97-374-C In Re: Proceeding to Review BellSouth
13 Telecommunications, Inc.'s Cost Studies for Unbundled Network Elements.
14

15 Q. WHAT DO YOU PROPOSE WITH RESPECT TO RATES FOR UNE
16 COMBINATIONS?

17 A. We would propose that once the Commission adopts a deaveraging
18 methodology, the Commission then apply that methodology to the average
19 UNE combination rates proposed by BellSouth to arrive at "interim"
20 deaveraged rates for UNE combinations. The Commission would then
21 replace those interim rates, with or without a true up process, with
22 permanent cost based UNE combination rates adopted by the Commission
23 in another proceeding where sufficient time can be provided other parties to
24 both present their direct case for cost based UNE combination rates and

1 adequately analyze BellSouth's proposed UNE combination rates. We
2 envision that this proceeding could take the form of an arbitration in which
3 rates for UNE combinations are specifically identified as issues to be
4 addressed by the Commission or a generic proceeding established by the
5 Commission to address UNE combination rates.

6
7 Q. IF THE COMMISSION AND THE PARTIES TO THIS PROCEEDING DO
8 NOT AGREE TO THIS INTERIM SOLUTION FOR DEAVERAGING
9 BELL SOUTH'S PROPOSED UNE COMBINATION RATES, WHAT
10 SHOULD THE COMMISSION DO?

11 A. The Commission should strike all portions of BellSouth's testimony and
12 cost models that pertain to UNE combinations because of the following
13 reasons.
14

15 (a) This proceeding was established to deaverage existing UNE
16 rates. This proceeding was not established to create new UNE or
17 UNE combination rates. Commission approved cost based UNE
18 combination rates do not exist in South Carolina and as such, none
19 can be deaveraged. Therefore, the deaveraging of rates not yet
20 established by this Commission is beyond the scope of this
21 proceeding.

22 (b) MCI WorldCom and other parties to this proceeding have
23 not been afforded an opportunity to engage in any meaningful

1 discovery with regard to this complex issue of UNE combination
2 rates.

3 (c) MCI WorldCom and other parties to this proceeding have
4 not been afforded an opportunity to prepare and file their own cost
5 studies for UNE combinations nor were the parties afforded an
6 opportunity to present their direct case concerning cost based UNE
7 combination rates.

8 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

9 A. Yes.

10

11

Attachment I

State	ILEC	CLLI	Loop						Total Switched Lines	total loop cost	Percent	Zone
SC	Southern Bell-Sc	WCLMSCM A	\$14.28						1,355	\$232,192.80	58.11%	1
SC	Southern Bell-Sc	CLMASCB Q	\$14.66						761	\$133,875.12	59.66%	1
SC	Southern Bell-Sc	CLMASCSN	\$14.68						72,454	\$12,763,496.64	59.74%	1
SC	Southern Bell-Sc	CLMASCPA	\$14.84						681	\$121,272.48	60.39%	1
SC	Southern Bell-Sc	CHTNSCDT	\$15.42						30,971	\$5,730,873.84	62.75%	1
SC	Southern Bell-Sc	GNVLSCDT	\$16.31						60,459	\$11,833,035.48	66.38%	1
SC	Southern Bell-Sc	CHTNSCN O	\$17.16						33,652	\$6,929,619.84	69.83%	1
SC	Southern Bell-Sc	CLMASCSA	\$17.54						31,532	\$6,636,855.36	71.38%	1
SC	Southern Bell-Sc	GNVLSCW R	\$18.48						42,455	\$9,414,820.80	75.21%	1
SC	Southern Bell-Sc	CHTNSCLB	\$18.57						24,628	\$5,488,103.52	75.57%	1
SC	Southern Bell-Sc	CLMASCSU	\$18.64						24,747	\$5,535,408.96	75.86%	1
SC	Southern Bell-Sc	SPBGSCM A	\$19.63						43,978	\$10,359,457.68	79.89%	1
SC	Southern Bell-Sc	GNVLSCCH	\$19.75						31,648	\$7,500,576.00	80.38%	1
SC	Southern Bell-Sc	CHTNSCDP	\$20.05						43,671	\$10,507,242.60	81.60%	1
SC	Southern Bell-Sc	CHTNSCW A	\$20.28						43,358	\$10,551,602.88	82.53%	1
SC	Southern Bell-Sc	CHTNSCJM	\$20.58						17,885	\$4,416,879.60	83.75%	2
SC	Southern Bell-Sc	CLMASCS W	\$20.77						34,946	\$8,709,941.04	84.53%	2
SC	Southern Bell-Sc	CLMASCC H	\$20.80						25,243	\$6,300,652.80	84.65%	2
SC	Southern Bell-Sc	CLSNSCMA	\$20.85						10,134	\$2,535,526.80	84.85%	2
SC	Southern Bell-Sc	PDMTSCES	\$21.37						1,532	\$392,866.08	86.97%	2
SC	Southern Bell-Sc	MNPLSCES	\$21.37						29,578	\$7,584,982.32	86.97%	2
SC	Southern Bell-Sc	GNVLSCCR	\$21.54						16,635	\$4,299,814.80	87.66%	2
SC	Southern Bell-Sc	CLMASCDF	\$21.65						21,366	\$5,550,886.80	88.11%	2
SC	Southern Bell-Sc	GNVLSCW E	\$22.11						19,373	\$5,140,044.36	89.98%	2
SC	Southern Bell-Sc	GNVLSCB	\$22.22						13,901	\$3,706,562.64	90.43%	2
SC	Southern Bell-Sc	GRERSCM A	\$22.30						24,926	\$6,670,197.60	90.75%	2
SC	Southern Bell-Sc	ISPLSCIS	\$22.51						5,056	\$1,365,726.72	91.61%	2
SC	Southern Bell-Sc	SPBGSCW V	\$22.72						23,697	\$6,460,750.08	92.46%	2
SC	Southern Bell-Sc	FLRNSCMA	\$22.80						51,914	\$14,203,670.40	92.79%	2
SC	Southern Bell-Sc	ARSNSCM A	\$23.23						44,895	\$12,514,930.20	94.54%	2
SC	Southern Bell-Sc	NAGSSCM A	\$23.62						20,484	\$5,805,984.96	96.12%	2
SC	Southern Bell-Sc	SUVLSCMA	\$24.15						42,161	\$12,218,257.80	98.28%	2
SC	Southern Bell-Sc	SPBGSCCV	\$24.41						5,831	\$1,708,016.52	99.34%	2

SC	Southern Bell-Sc	CLMASCAR	\$24.74	21,889	\$6,498,406.32	100.68%	2
SC	Southern Bell-Sc	SENCSCM	\$25.12	11,526	\$3,474,397.44	102.23%	2
		A					
SC	Southern Bell-Sc	LYMNSCES	\$25.14	9,201	\$2,775,757.68	102.31%	2
SC	Southern Bell-Sc	SPBGSCBS	\$25.18	13,431	\$4,058,310.96	102.47%	2
SC	Southern Bell-Sc	ESLYSCMA	\$25.26	23,255	\$7,049,055.60	102.80%	3
SC	Southern Bell-Sc	CLMASCSH	\$25.53	21,296	\$6,524,242.56	103.90%	3
SC	Southern Bell-Sc	FLBHSCMA	\$25.57	1,062	\$325,864.08	104.06%	3
SC	Southern Bell-Sc	BEVLSCMA	\$25.99	7,199	\$2,245,224.12	105.77%	3
SC	Southern Bell-Sc	CENTSCW	\$26.06	2,982	\$932,531.04	106.05%	3
		S					
SC	Southern Bell-Sc	LYMNSCIP	\$26.07	2,775	\$868,131.00	106.10%	3
SC	Southern Bell-Sc	AIKNSCMA	\$26.46	34,130	\$10,836,957.6	107.68%	3
					0		
SC	Southern Bell-Sc	TRRSSCM	\$26.55	7,317	\$2,331,196.20	108.05%	3
		A					
SC	Southern Bell-Sc	BATHSCMA	\$27.09	6,010	\$1,953,730.80	110.25%	3
SC	Southern Bell-Sc	SBRKSCSK	\$27.50	3,548	\$1,170,840.00	111.91%	3
SC	Southern Bell-Sc	CWPNSCM	\$27.80	2,845	\$949,092.00	113.14%	3
		A					
SC	Southern Bell-Sc	LBRTSCMA	\$27.97	3,840	\$1,288,857.60	113.83%	3
SC	Southern Bell-Sc	LKWLSCRS	\$28.01	4,697	\$1,578,755.64	113.99%	3
SC	Southern Bell-Sc	WMTNSCP	\$28.26	9,048	\$3,068,357.76	115.01%	3
		W					
SC	Southern Bell-Sc	ORBGSCM	\$28.55	25,674	\$8,795,912.40	116.19%	3
		A					
SC	Southern Bell-Sc	PNTNSCM	\$29.68	4,146	\$1,476,639.36	120.79%	3
		A					
SC	Southern Bell-Sc	GFNYSCM	\$29.80	20,311	\$7,263,213.60	121.27%	3
		A					
SC	Southern Bell-Sc	DLLNSCMA	\$30.27	7,946	\$2,886,305.04	123.19%	3
SC	Southern Bell-Sc	CLMASCSC	\$30.34	7,065	\$2,572,225.20	123.47%	3
SC	Southern Bell-Sc	CLVRSCES	\$30.61	6,048	\$2,221,551.36	124.57%	3
SC	Southern Bell-Sc	FNINSCES	\$30.70	6,884	\$2,536,065.60	124.94%	3
SC	Southern Bell-Sc	CLTNSCMA	\$31.18	6,349	\$2,375,541.84	126.89%	3
SC	Southern Bell-Sc	HTVLSCMA	\$31.21	15,340	\$5,745,136.80	127.01%	3
SC	Southern Bell-Sc	MLNSSCW	\$31.30	5,957	\$2,237,449.20	127.38%	3
		P					
SC	Southern Bell-Sc	PCKNSCES	\$31.45	8,654	\$3,266,019.60	127.99%	3
SC	Southern Bell-Sc	BETNSCMA	\$31.88	6,807	\$2,604,085.92	129.74%	3
SC	Southern Bell-Sc	YORKSCM	\$32.43	9,030	\$3,514,114.80	131.98%	3
		A					
SC	Southern Bell-Sc	NWBYSKM	\$32.44	10,904	\$4,244,709.12	132.02%	3
		A					
SC	Southern Bell-Sc	DRTNSCM	\$32.48	13,262	\$5,168,997.12	132.18%	3
		A					
SC	Southern Bell-Sc	WLHLSCES	\$32.65	7,912	\$3,099,921.60	132.87%	3
SC	Southern Bell-Sc	HNPSCM	\$32.69	3,699	\$1,451,043.72	133.04%	3
		A					
SC	Southern Bell-Sc	PCLTSCES	\$33.40	2,184	\$875,347.20	135.93%	3
SC	Southern Bell-Sc	MCCLSCM	\$33.43	1,652	\$662,716.32	136.05%	3
		A					
SC	Southern Bell-Sc	CHRWSCS	\$33.90	8,010	\$3,258,468.00	137.96%	3
		S					
SC	Southern Bell-Sc	UNINSCMA	\$34.10	11,530	\$4,718,076.00	138.77%	3
SC	Southern Bell-Sc	BHISSCMA	\$34.40	2,314	\$955,219.20	140.00%	3

SC	Southern Bell-Sc	GIVLSCMA	\$34.86	4,654	\$1,946,861.28	141.87%	3
SC	Southern Bell-Sc	CMDNSCL	\$34.91	8,381	\$3,510,968.52	142.07%	3
		G					
SC	Southern Bell-Sc	NWELSCM	\$35.06	2,533	\$1,065,683.76	142.68%	3
		A					
SC	Southern Bell-Sc	JONNSCES	\$35.60	1,183	\$505,377.60	144.88%	3
SC	Southern Bell-Sc	BTBGSCM	\$35.60	7,281	\$3,110,443.20	144.88%	3
		A					
SC	Southern Bell-Sc	BAVLSCMA	\$35.69	1,765	\$755,914.20	145.24%	3
SC	Southern Bell-Sc	CMDNSCM	\$36.04	14,286	\$6,178,409.28	146.67%	3
		A					
SC	Southern Bell-Sc	EDBHSCM	\$36.27	1,977	\$860,469.48	147.61%	3
		A					
SC	Southern Bell-Sc	BLBGSCMA	\$36.48	3,528	\$1,544,417.28	148.46%	3
SC	Southern Bell-Sc	FNVLSCMA	\$37.71	2,215	\$1,002,331.80	153.47%	3
SC	Southern Bell-Sc	MARNSCM	\$37.84	7,345	\$3,335,217.60	153.99%	3
		A					
SC	Southern Bell-Sc	ARSNSCAH	\$38.54	4,855	\$2,245,340.40	156.84%	3
SC	Southern Bell-Sc	CHTNSCJN	\$38.89	4,973	\$2,320,799.64	158.27%	3
SC	Southern Bell-Sc	BRWLSCB	\$39.16	5,946	\$2,794,144.32	159.37%	3
		E					
SC	Southern Bell-Sc	CHAPSCCL	\$39.40	6,269	\$2,963,983.20	160.34%	3
SC	Southern Bell-Sc	DNMKSCS	\$39.55	2,195	\$1,041,747.00	160.95%	3
		S					
SC	Southern Bell-Sc	WHTMSCM	\$40.38	1,591	\$770,934.96	164.33%	3
		A					
SC	Southern Bell-Sc	JHTNSCMA	\$40.77	2,709	\$1,325,351.16	165.92%	3
SC	Southern Bell-Sc	BLRGSCM	\$40.86	5,427	\$2,660,966.64	166.28%	3
		A					
SC	Southern Bell-Sc	WMNSSCE	\$41.27	5,818	\$2,881,306.32	167.95%	3
		S					
SC	Southern Bell-Sc	BMBRSCM	\$41.32	3,161	\$1,567,350.24	168.16%	3
		A					
SC	Southern Bell-Sc	TMVLSCMA	\$43.91	3,799	\$2,001,769.08	178.70%	3
SC	Southern Bell-Sc	LATTSCLS	\$44.54	2,440	\$1,304,131.20	181.26%	3
SC	Southern Bell-Sc	EDFDSCM	\$45.43	3,200	\$1,744,512.00	184.88%	3
		A					
SC	Southern Bell-Sc	EOVRSCM	\$46.82	2,917	\$1,638,887.28	190.54%	3
		A					
SC	Southern Bell-Sc	ALDLSCMA	\$47.08	2,707	\$1,529,346.72	191.60%	3
SC	Southern Bell-Sc	MRTTSCM	\$47.38	4,248	\$2,415,242.88	192.82%	3
		A					
SC	Southern Bell-Sc	ARSNSCTV	\$47.59	2,641	\$1,508,222.28	193.67%	3
SC	Southern Bell-Sc	SXMLSCM	\$47.62	2,564	\$1,465,172.16	193.80%	3
		A					
SC	Southern Bell-Sc	GNVLSCW	\$49.90	3,075	\$1,841,310.00	203.07%	3
		P					
SC	Southern Bell-Sc	SALMSCM	\$50.57	2,513	\$1,524,988.92	205.80%	3
		A					
SC	Southern Bell-Sc	JNVLSCMA	\$51.33	2,550	\$1,570,698.00	208.89%	3
SC	Southern Bell-Sc	STGRSCM	\$52.70	4,668	\$2,952,043.20	214.47%	3
		A					
SC	Southern Bell-Sc	PRSRSCM	\$52.98	3,108	\$1,975,942.08	215.61%	3
		A					
SC	Southern Bell-Sc	CLIOSCMA	\$54.79	831	\$546,365.88	222.97%	3
SC	Southern Bell-Sc	TKNASCS	\$55.36	1,907	\$1,266,858.24	225.29%	3

SC	Southern Bell-Sc	SCHLSCES	\$56.85	917	\$625,577.40	231.36%
SC	Southern Bell-Sc	LKVWSCM	\$64.30	1,267	\$977,617.20	261.68%
		A				
SC	Southern Bell-Sc	SPFDSCMA	\$64.83	901	\$700,941.96	263.83%
SC	Southern Bell-Sc	HCGVSCM	\$68.51	879	\$722,643.48	278.81%
		A				
SC	Southern Bell-Sc	SHRNSCM	\$68.69	644	\$530,836.32	279.54%
		A				
SC	Southern Bell-Sc	MARNSCB	\$90.34	1,459	\$1,581,672.72	367.65%
		N				
SC	Southern Bell-Sc	BLNHSCMA	\$90.73	1,260	\$1,371,837.60	369.24%
SC	Southern Bell-Sc	TOTAL	24.57228	1,422,223	\$419,367,227.40	
			1/3 Lines	474,074		
			AVG	# of Lines	Weighting	
			Cost			
	Zone 1	17.77	486,350	72.34%		
	Zone 2	22.62	465,604	92.06%		
	Zone 3	33.53	470,269	136.47%		

**BELLSOUTH SOUTH CAROLINA
DEAVERAGED LOOP RATES
MCIWORLD COM PROPOSAL**

	Zone 1	Zone 2	Zone 3	Average
a. 2-wire Voice Grade Analog Loop SL1	\$16.27	\$20.70	\$30.69	\$22.49
b. 2-wire Voice Grade Analog Loop SL2	\$18.99	\$24.17	\$35.82	\$26.25
c. 4-wire Voice Grade Analog Loop	\$25.95	\$33.03	\$48.96	\$35.88
d. 2-wire ISDN digital Loop	\$23.49	\$29.89	\$44.31	\$32.47
e. 2-wire ADSL Compatible Loop	\$15.05	\$19.16	\$28.40	\$20.81
f. 2-wire HDSL Compatible Loop	\$10.75	\$13.68	\$20.28	\$14.86
g. 4-wire HDSL Compatible Loop	\$14.27	\$18.16	\$26.93	\$19.73
h. 4-wire DS-1 Loop	\$52.55	\$66.88	\$99.14	\$72.65
i. 4-wire 56/64 kbps digital loop	\$30.16	\$38.39	\$56.91	\$41.70
Zone Weighting	72.34%	92.06%	136.47%	%

State	ILEC	CLLI	Loop					Total Switched Lines	total loop cost	Percent	Zone
SC	Southern Bell-Sc	WCLMSCM A	\$14.28					1,355	\$232,192.80	58.11%	1
SC	Southern Bell-Sc	CLMASCB Q	\$14.66					761	\$133,875.12	59.66%	1
SC	Southern Bell-Sc	CLMASCSN	\$14.68					72,454	\$12,763,496.64	59.74%	1
SC	Southern Bell-Sc	CLMASCPA	\$14.84					681	\$121,272.48	60.39%	1
SC	Southern Bell-Sc	CHTNSCDT	\$15.42					30,971	\$5,730,873.84	62.75%	1
SC	Southern Bell-Sc	GNVLSCDT	\$16.31					60,459	\$11,833,035.48	66.38%	1
SC	Southern Bell-Sc	CHTNSCN O	\$17.16					33,652	\$6,929,619.84	69.83%	1
SC	Southern Bell-Sc	CLMASCSA	\$17.54					31,532	\$6,636,855.36	71.38%	1
SC	Southern Bell-Sc	GNVLSCW R	\$18.48					42,455	\$9,414,820.80	75.21%	1
SC	Southern Bell-Sc	CHTNSCLB	\$18.57					24,628	\$5,488,103.52	75.57%	1
SC	Southern Bell-Sc	CLMASCSU	\$18.64					24,747	\$5,535,408.96	75.86%	1
SC	Southern Bell-Sc	SPBGSCM A	\$19.63					43,978	\$10,359,457.68	79.89%	1
SC	Southern Bell-Sc	GNVLSCCH	\$19.75					31,648	\$7,500,576.00	80.38%	1
SC	Southern Bell-Sc	CHTNSCDP	\$20.05					43,671	\$10,507,242.60	81.60%	1
SC	Southern Bell-Sc	CHTNSCW A	\$20.28					43,358	\$10,551,602.88	82.53%	1
SC	Southern Bell-Sc	CHTNSCJM	\$20.58					17,885	\$4,416,879.60	83.75%	1
SC	Southern Bell-Sc	CLMASCS W	\$20.77					34,946	\$8,709,941.04	84.53%	1
SC	Southern Bell-Sc	CLMASCC H	\$20.80					25,243	\$6,300,652.80	84.65%	1
SC	Southern Bell-Sc	CLNSCMA	\$20.85					10,134	\$2,535,526.80	84.85%	1
SC	Southern Bell-Sc	PDMTSCES	\$21.37					1,532	\$392,866.08	86.97%	1
SC	Southern Bell-Sc	MNPLSCES	\$21.37					29,578	\$7,584,982.32	86.97%	1
SC	Southern Bell-Sc	GNVLSCCR	\$21.54					16,635	\$4,299,814.80	87.66%	1
SC	Southern Bell-Sc	CLMASCDF	\$21.65					21,366	\$5,550,886.80	88.11%	1
SC	Southern Bell-Sc	GNVLSCW E	\$22.11					19,373	\$5,140,044.36	89.98%	1
SC	Southern Bell-Sc	GNVLSCBE	\$22.22					13,901	\$3,706,562.64	90.43%	1
SC	Southern Bell-Sc	GRERSCM A	\$22.30					24,926	\$6,670,197.60	90.75%	1
SC	Southern Bell-Sc	ISPLSCIS	\$22.51					5,056	\$1,365,726.72	91.61%	1
SC	Southern Bell-Sc	SPBGSCW V	\$22.72					23,697	\$6,460,750.08	92.46%	1
SC	Southern Bell-Sc	FLRNSCMA	\$22.80					51,914	\$14,203,670.40	92.79%	1
SC	Southern Bell-Sc	ARSNSCM A	\$23.23					44,895	\$12,514,930.20	94.54%	1
SC	Southern Bell-Sc	NAGSSCM A	\$23.62					20,484	\$5,805,984.96	96.12%	1
SC	Southern Bell-Sc	SUVLSCMA	\$24.15					42,161	\$12,218,257.80	98.28%	1
SC	Southern Bell-Sc	SPBGSCCV	\$24.41					5,831	\$1,708,016.52	99.34%	1

SC	Southern Bell-Sc	CLMASCAR	\$24.74	21,889	\$6,498,406.32	100.68%	2
SC	Southern Bell-Sc	SENCSCM	\$25.12	11,526	\$3,474,397.44	102.23%	2
		A					
SC	Southern Bell-Sc	LYMNSCES	\$25.14	9,201	\$2,775,757.68	102.31%	2
SC	Southern Bell-Sc	SPBGSCBS	\$25.18	13,431	\$4,058,310.96	102.47%	2
SC	Southern Bell-Sc	ESLYSCMA	\$25.26	23,255	\$7,049,055.60	102.80%	2
SC	Southern Bell-Sc	CLMASC SH	\$25.53	21,296	\$6,524,242.56	103.90%	2
SC	Southern Bell-Sc	FLBHSCMA	\$25.57	1,062	\$325,864.08	104.06%	2
SC	Southern Bell-Sc	BEVLSCMA	\$25.99	7,199	\$2,245,224.12	105.77%	2
SC	Southern Bell-Sc	CENTSCW	\$26.06	2,982	\$932,531.04	106.05%	2
		S					
SC	Southern Bell-Sc	LYMN SCIP	\$26.07	2,775	\$868,131.00	106.10%	2
SC	Southern Bell-Sc	AIKN SCMA	\$26.46	34,130	\$10,836,957.60	107.68%	2
SC	Southern Bell-Sc	TRRSSCM	\$26.55	7,317	\$2,331,196.20	108.05%	2
		A					
SC	Southern Bell-Sc	BATHSCMA	\$27.09	6,010	\$1,953,730.80	110.25%	2
SC	Southern Bell-Sc	SBRKSCSK	\$27.50	3,548	\$1,170,840.00	111.91%	2
SC	Southern Bell-Sc	CWPNSCM	\$27.80	2,845	\$949,092.00	113.14%	2
		A					
SC	Southern Bell-Sc	LBRTSCMA	\$27.97	3,840	\$1,288,857.60	113.83%	2
SC	Southern Bell-Sc	LKWLSCRS	\$28.01	4,697	\$1,578,755.64	113.99%	2
SC	Southern Bell-Sc	WMTNSCP	\$28.26	9,048	\$3,068,357.76	115.01%	2
		W					
SC	Southern Bell-Sc	ORBGSCM	\$28.55	25,674	\$8,795,912.40	116.19%	2
		A					
SC	Southern Bell-Sc	PNTNSCM	\$29.68	4,146	\$1,476,639.36	120.79%	2
		A					
SC	Southern Bell-Sc	GFNYSCM	\$29.80	20,311	\$7,263,213.60	121.27%	2
		A					
SC	Southern Bell-Sc	DLLNSCMA	\$30.27	7,946	\$2,886,305.04	123.19%	2
SC	Southern Bell-Sc	CLMASCSC	\$30.34	7,065	\$2,572,225.20	123.47%	2
SC	Southern Bell-Sc	CLVRSCES	\$30.61	6,048	\$2,221,551.36	124.57%	2
SC	Southern Bell-Sc	FNINSCES	\$30.70	6,884	\$2,536,065.60	124.94%	2
SC	Southern Bell-Sc	CLTN SCMA	\$31.18	6,349	\$2,375,541.84	126.89%	2
SC	Southern Bell-Sc	HTVLSCMA	\$31.21	15,340	\$5,745,136.80	127.01%	2
SC	Southern Bell-Sc	MLNSSCW	\$31.30	5,957	\$2,237,449.20	127.38%	2
		P					
SC	Southern Bell-Sc	PCKNSCES	\$31.45	8,654	\$3,266,019.60	127.99%	2
SC	Southern Bell-Sc	BETNSCMA	\$31.88	6,807	\$2,604,085.92	129.74%	2
SC	Southern Bell-Sc	YORKSCM	\$32.43	9,030	\$3,514,114.80	131.98%	2
		A					
SC	Southern Bell-Sc	NWBYS CM	\$32.44	10,904	\$4,244,709.12	132.02%	2
		A					
SC	Southern Bell-Sc	DRTNSCM	\$32.48	13,262	\$5,168,997.12	132.18%	2
		A					
SC	Southern Bell-Sc	WLHLSCES	\$32.65	7,912	\$3,099,921.60	132.87%	2
SC	Southern Bell-Sc	HNP HSCM	\$32.69	3,699	\$1,451,043.72	133.04%	2
		A					
SC	Southern Bell-Sc	PCLTSCES	\$33.40	2,184	\$875,347.20	135.93%	2
SC	Southern Bell-Sc	MCCLSCM	\$33.43	1,652	\$662,716.32	136.05%	2
		A					
SC	Southern Bell-Sc	CHRWSCES	\$33.90	8,010	\$3,258,468.00	137.96%	2
		S					
SC	Southern Bell-Sc	UNIN SCMA	\$34.10	11,530	\$4,718,076.00	138.77%	2
SC	Southern Bell-Sc	BHISSCMA	\$34.40	2,314	\$955,219.20	140.00%	2

SC	Southern Bell-Sc	GIVLSCMA	\$34.86	4,654	\$1,946,861.28	141.87%	2
SC	Southern Bell-Sc	CMDNSCL	\$34.91	8,381	\$3,510,968.52	142.07%	2
		G					
SC	Southern Bell-Sc	NWELSCM	\$35.06	2,533	\$1,065,683.76	142.68%	2
		A					
SC	Southern Bell-Sc	JONNSCES	\$35.60	1,183	\$505,377.60	144.88%	2
SC	Southern Bell-Sc	BTBGSCM	\$35.60	7,281	\$3,110,443.20	144.88%	2
		A					
SC	Southern Bell-Sc	BAVLSCMA	\$35.69	1,765	\$755,914.20	145.24%	2
SC	Southern Bell-Sc	CMDNSCM	\$36.04	14,286	\$6,178,409.28	146.67%	2
		A					
SC	Southern Bell-Sc	EDBHSCM	\$36.27	1,977	\$860,469.48	147.61%	2
		A					
SC	Southern Bell-Sc	BLBGSCMA	\$36.48	3,528	\$1,544,417.28	148.46%	2
SC	Southern Bell-Sc	FNVLSCMA	\$37.71	2,215	\$1,002,331.80	153.47%	2
SC	Southern Bell-Sc	MARNSCM	\$37.84	7,345	\$3,335,217.60	153.99%	2
		A					
SC	Southern Bell-Sc	ARSNSCAH	\$38.54	4,855	\$2,245,340.40	156.84%	2
SC	Southern Bell-Sc	CHTNSCJN	\$38.89	4,973	\$2,320,799.64	158.27%	2
SC	Southern Bell-Sc	BRWLSCB	\$39.16	5,946	\$2,794,144.32	159.37%	2
		E					
SC	Southern Bell-Sc	CHAPSCCL	\$39.40	6,269	\$2,963,983.20	160.34%	2
SC	Southern Bell-Sc	DNMKSCS	\$39.55	2,195	\$1,041,747.00	160.95%	2
		S					
SC	Southern Bell-Sc	WHTMSCM	\$40.38	1,591	\$770,934.96	164.33%	2
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SC	Southern Bell-Sc	JHTNSCMA	\$40.77	2,709	\$1,325,351.16	165.92%	2
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		A					
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		S					
SC	Southern Bell-Sc	BMBRSCM	\$41.32	3,161	\$1,567,350.24	168.16%	2
		A					
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		A					
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SC	Southern Bell-Sc	MRTTSCM	\$47.38	4,248	\$2,415,242.88	192.82%	2
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SC	Southern Bell-Sc	ARSNSCTV	\$47.59	2,641	\$1,508,222.28	193.67%	2
SC	Southern Bell-Sc	SXMLSCM	\$47.62	2,564	\$1,465,172.16	193.80%	2
		A					
SC	Southern Bell-Sc	GNVLSCW	\$49.90	3,075	\$1,841,310.00	203.07%	3
		P					
SC	Southern Bell-Sc	SALMSCM	\$50.57	2,513	\$1,524,988.92	205.80%	3
		A					
SC	Southern Bell-Sc	JNVLSCMA	\$51.33	2,550	\$1,570,698.00	208.89%	3
SC	Southern Bell-Sc	STGRSCM	\$52.70	4,668	\$2,952,043.20	214.47%	3
		A					
SC	Southern Bell-Sc	PRSRSCM	\$52.98	3,108	\$1,975,942.08	215.61%	3
		A					
SC	Southern Bell-Sc	CLIOSCMA	\$54.79	831	\$546,365.88	222.97%	3
SC	Southern Bell-Sc	TKNASCST	\$55.36	1,907	\$1,266,858.24	225.29%	3

SC	Southern Bell-Sc	SCHLSCES	\$56.85	917	\$625,577.40	231.36%
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		A				
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SC	Southern Bell-Sc	HCGVSCM	\$68.51	879	\$722,643.48	278.81%
		A				
SC	Southern Bell-Sc	SHRNSCM	\$68.69	644	\$530,836.32	279.54%
		A				
SC	Southern Bell-Sc	MARNSCB	\$90.34	1,459	\$1,581,672.72	367.65%
		N				
SC	Southern Bell-Sc	BLNHSCMA	\$90.73	1,260	\$1,371,837.60	369.24%
SC	Southern Bell-Sc	TOTAL	24.57228	1,422,223	\$419,367,227.40	

	AVG Cost	# of Lines	Weighting
Zone 1	19.84	895,907	80.75%
Zone 2	31.29	500,337	127.33%
Zone 3	58.35	25,979	237.45%

**BELLSOUTHSOUTH CAROLINA
DEAVERAGED LOOP RATES
FLORIDA STIPULATION
METHODOLOGY**

	Zone 1	Zone 2	Zone 3	Average
a. 2-wire Voice Grade Analog Loop SL1	\$18.16	\$28.64	\$53.40	\$22.49
b. 2-wire Voice Grade Analog Loop SL2	\$21.20	\$33.42	\$62.33	\$26.25
c. 4-wire Voice Grade Analog Loop	\$28.97	\$45.69	\$85.20	\$35.88
d. 2-wire ISDN digital Loop	\$26.22	\$41.34	\$77.10	\$32.47
e. 2-wire ADSL Compatible Loop	\$16.80	\$26.50	\$49.41	\$20.81
f. 2-wire HDSL Compatible Loop	\$12.00	\$18.92	\$35.28	\$14.86
g. 4-wire HDSL Compatible Loop	\$15.93	\$25.12	\$46.85	\$19.73
h. 4-wire DS-1 Loop	\$58.67	\$92.51	\$172.51	\$72.65
i. 4-wire 56/64 kbps digital loop	\$33.67	\$53.10	\$99.02	\$41.70
Zone Weighting	80.75%	127.33%	237.45%	
		%	%	

Attachment 3

GREGORY J. DARNELL
PROFESSIONAL EXPERIENCE

6/21/96 – Date *REGIONAL SENIOR MANAGER, MCI, LAW & PUBLIC POLICY.*

Responsibilities: Define MCI's public policy and ensure effective advocacy throughout BellSouth Region.

9/1/95 – 6/21/96 *SENIOR STAFF SPECIALIST III, MCI, NATIONAL ACCESS POLICY.*

Responsibilities: Define MCI's national access policies and educate field personnel. Present MCI's access policy positions to Executive Management and obtain concordance.

9/1/94 – 9/1/95 *SENIOR STAFF SPECIALIST III, MCI, CARRIER RELATIONS.*

Responsibilities: Manage MCI's business relationship with ALLTEL.

1/1/93 – 9/1/94 *SENIOR STAFF SPECIALIST II, MCI, SOUTHERN CARRIER MANAGEMENT.*

Responsibilities: Chief of Staff.

9/1/91 – 1/1/93 *MANAGER, MCI, ECONOMIC ANALYSIS.*

Responsibilities: Testify before state utility commissions on access issues. Write tariff and rulemaking pleadings before the FCC. Serve as MCI's expert on Local Exchange Carrier revenue requirements, demand forecasts and access rate structures.

1/1/90 – 9/1/91 *SENIOR STAFF SPECIALIST I, MCI, FEDERAL REGULATORY.*

Responsibilities: Direct analysis to support MCI's positions in FCC tariff and rulemaking proceedings. Provide access cost input to MCI's Business Plan. Write and file petitions against annual tariff filings and requests for rulemaking. Train State Utility Commissions on the use and design of financial databases.

1/1/89 – 1/1/90 *STAFF SPECIALIST III, MCI, FEDERAL REGULATORY.*

Responsibilities: Track and monitor tariff transmittals for Ameritech, BellSouth, SWBT and U S West. Author petitions opposing RBOC tariff filings. Represent MCI at National Ordering and Billing Forum.

10/9/87 – 1/1/89 *SUPERVISOR, MCI, TELCO COST ANALYSIS.*

Responsibilities: Supervise team of analysts in their review of interstate access tariff changes. Coordinate updates to Special Access billing system.

Attachment 5 (CONT)

1/1/86 - 10/9/87 *FINANCIAL ANALYST III, MCI, TELCO COST.*

Responsibilities: Analyze MCI's access costs and produce forecasts.

6/1/85 - 1/1/86 *STAFF ADMINISTRATOR II, MCI, LITIGATION SUPPORT.*

Responsibilities: Support MCI's antitrust counsel in taking depositions, preparing interrogatories and document requests.

1/1/84 - 6/1/85 *PRODUCTION ANALYST, MCI, LITIGATION SUPPORT.*

Responsibilities: Review and abstract MCI and AT&T documents obtained in MCI's antitrust litigation.

8/1/82 - 1/1/84 *LEGAL ASSISTANT, GARDNER, CARTON AND DOUGLAS.*

Responsibilities: Research and obtain information from the FCC, FERC and SEC.

EDUCATIONAL EXPERIENCE

9/1/91 - 1/1/93 *GEORGE WASHINGTON UNIVERSITY, GRADUATE SCHOOL OF
TELECOMMUNICATIONS.*

Studies: Advanced courses in Public Policy, Electrical Engineering and Economics.

9/1/78 - 6/1/82 *UNIVERSITY OF MARYLAND, B.A., ECONOMICS.*

Studies: Macro and Micro Economics, Statistics, Calculus, Astronomy and Music.

CERTIFICATE OF SERVICE

I, Betty J. DeHart of Woodward, Cothran & Herndon, Attorneys for MCI WorldCom Network Services, Inc., and MCI WorldCom Communications, Inc., do hereby certify that I have served a copy of the Direct Testimony of Greg Darnell by causing to be deposited in a United States Postal Service mailbox copies of the same, postage prepaid, addressed to the persons indicated below.

F. David Butler, Esquire
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of South Carolina
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Columbia, S. C. 29211

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Betty J. DeHart
Betty J. DeHart

SWORN to before me this

3rd day of April, 2000.

Amisha Agha (L.S.)
Notary Public for South Carolina

My Commission Expires: 8-25-09